

## AMENDMENTS TO THE DRAWINGS

Please amend the above-identified application as follows:

In the Drawings:

The Office Action states at page 2:

The drawings are objected to as failing to comply with 37 CFR § 1.84(p)(4) because reference character “316” has been used to designate both the ‘Rows’ in the Fact Table – 312 and ‘Dependencies’ in database - 308.

In this Response, Applicants amend Figure 3 to remove the objection. That is, Applicants amend Figure 3 by changing from ‘316’ to ‘315’ the reference character designating Rows in Fact Table 312.

Attachment: Replacement Sheet 3  
Annotated Sheet Showing the Change

## REMARKS

Claims 1, 7, and 13 stand rejected under 35 U.S.C § 102(b) as being anticipated by Weissman, *et al.* (U.S. Patent No. 6,212,524). Claims 2, 8, and 14 stand rejected for obviousness under 35 U.S.C § 103(a) as being unpatentable over Weissman, *et al.* (U.S. Patent No. 6,212,524), in view of Veronese, *et al.* (U.S. Patent App. Pub. No. 2004/0210445). Claims 3-6, 9-12, and 15-18 stand rejected for obviousness under 35 U.S.C § 103(a) as being unpatentable over Weissman, *et al.* (U.S. Patent No. 6,212,524), in view of Veronese, *et al.* (U.S. Patent App. Pub. No. 2004/0210445) and further in view of Medicke, *et al.* (U.S. Patent App. Pub. No. 2004/0236786). As is shown below, Weissman does not anticipate populating a database as claimed in the present application nor does any combination of Weissman, Veronese, and Medicke make obvious populating a database as claimed in the present application.

### **Claim Rejections – 35 U.S.C. §102 Over Weissman**

Claims 1, 7, and 13 stand rejected under 35 U.S.C § 102(b) as being anticipated by Weissman, *et al.* (U.S. Patent No. 6,212,524). To anticipate claims 1, 7, and 13 under 35 U.S.C. § 102(b), two basic requirements must be met. The first requirement of anticipation is that Weissman must disclose each and every element as set forth in Applicants' claims. The second requirement of anticipation is that Weissman must enable Applicants' claims. Weissman does not meet either requirement and therefore does not anticipate Applicants' claims. Claims 1, 7, and 13 are therefore patentable and should be allowed. Applicants respectfully traverse each rejection individually below and request reconsideration of claims 1, 7, and 13.

**Weissman Does Not Disclose Each and Every Element  
Of The Claims Of The Present Application**

“A claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference.” *Verdegaal Bros. v. Union Oil Co. of California*, 814 F.2d 628, 631, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987). As explained in more detail below, Weissman does not disclose each and every element of claim 1, and Weissman therefore cannot be said to anticipate the claims of the present application within the meaning of 35 U.S.C. 102.

Independent claim 1 claims:

A method for populating a database, the method comprising:

providing a database having a schema;

inferring from the schema dependencies among a fact table and related dimension tables; and

inserting, in accordance with the dependencies, rows of data into the fact table and rows of data into the dimension tables.

**Weissman Does Not Disclose  
Inferring From The Schema Dependencies Among  
A Fact Table And Related Dimension Tables**

Regarding the second element of claim 1, the Office Action states that Weissman at column 3, lines 1-2; column 3, lines 36-38; column 5, lines 36-32; column 7, lines 42-49; and column 10, lines 24-42 discloses:

inferring from the schema dependencies among a fact table and related dimension tables (Weissman: Column 3, lines 1-2, and lines 36-38; Column 5, lines 36-32; Column 7, lines 42-49; Column 10, lines 24-42)

That is, the Office Action takes the position that Weissman at column 3, lines 1-2; column 3, lines 36-38; column 5, lines 36-32; column 7, lines 42-49; and column 10, lines 24-42 discloses the second element of claim 1. Applicants respectfully note in response, however, that Weissman at column 3, lines 1-2; column 3, lines 36-38; column 5, lines 36-32; column 7, lines 42-49; and column 10, lines 24-42 does not disclose the second element of claim 1. What Weissman at column 3, lines 1-2, in fact discloses is: "The schema defines the relationships between the tables and columns." The schema of Weissman does not disclose inferring from the schema dependencies among a fact table and related dimension tables as claimed in the present application.

What Weissman at column 3, lines 36-38 discloses is:

In some embodiments, the schema is a star schema having one or more fact tables and one or more dimension tables (or dimensions). The schema can be held in a constellation that includes additional information. The constellation can correspond to a business process.

The star schema having fact tables and dimension tables of Weissman does not disclose inferring from the schema dependencies among a fact table and related dimension tables as claimed in the present application.

What Weissman at column 5, lines 26-32 discloses is:

Focusing on the datamart creation, the system allows a consultant to build a datamart from a schema definition of the sources of the data. From the schema definition the system automatically builds the table needed in the datamart. Also, from the schema definition, and the sources definition, the system can automatically extract the data from those sources.

The datamart creation system of Weissman does not disclose inferring from the schema dependencies among a fact table and related dimension tables as claimed in the present application.

What Weissman at column 7, lines 42-49 discloses is:

What is important is that the consultant can easily define a schema for the datamart 150 and that definition is kept in the schema definitions 161. From the schema definitions 161, not only can the tables in the datamart 150 be generated, but also the automatic extraction and conversion of the data from the source system 110 can be performed, aggregates are set up, and a query mechanism is generated.

The schema definitions of Weissman do not disclose inferring from the schema dependencies among a fact table and related dimension tables as claimed in the present application.

What Weissman at column 10, lines 24-42 discloses is:

At block 210, a consultant uses the enterprise manager 102 to define the schema. The schema is defined using the metadata 160. This process is illustrated in greater detail in FIG. 7 through FIG. 35. Generally, defining the schema involves determining the business processes of the organization for which the system 100 is being implemented. The consultant then defines the star schema for those business processes. The star schema has a fact table and a number of dimensions. The consultant also defines from where the data in the schema is to be derived. That is, the consultant defines from which fields and tables the information is to be extracted from the source systems 110. The consultant also defines how that data is to be put into the datamart 150. That is, the consultant associates each piece of data with a semantic meaning. This semantic meaning defines how the data from the source system is to be manipulated and how it is to populate the datamart 150. At this point, the consultant can also define the aggregates that can be used in the datamart 150.

The schema definition process of Weissman does not disclose inferring from the schema dependencies among a fact table and related dimension tables as claimed in the present application.

**Weissman Does Not Disclose**  
**Inserting Rows Of Data Into The Tables In**  
**Accordance With The Dependencies**

Regarding the third element of claim 1, the Office Action states that Weissman at column 3, lines 1-11, and column 10, lines 24-42 discloses:

Inserting, in accordance with the dependencies, rows of data into the fact table and rows of data into the dimensions tables (Weissman: Column 3, lines 1-11; Column 10, lines 24-42).

That is, the Office Action takes the position that Weissman at column 3, lines 1-11, and column 10, lines 24-42 discloses the third element of claim 1. Applicants respectfully note in response, however, that Weissman at column 3, lines 1-11, and column 10, lines 24-42 does not disclose the third element of claim 1. What Weissman at column 3, lines 1-11, in fact discloses is:

The schema defines the relationships between the tables and columns. The description further defines how data is to be manipulated and used to populate the tables in the datamart. That is, the description defines the semantic meaning of the data. The description is further used to create a set of commands to create the tables. The commands are executed causing the creation of the tables. Importantly, when the semantic meaning is associated with the column and rows, programs for manipulating and propagating data into those columns and rows are automatically defined.

The schema, description and commands of Weissman do not disclose inserting, in accordance with the dependencies, rows of data into the fact table and rows of data into the dimension tables as claimed in the present application.

What Weissman at column 10, lines 24-42 discloses is:

At block 210, a consultant uses the enterprise manager 102 to define the schema. The schema is defined using the metadata 160. This process is illustrated in greater detail in FIG. 7 through FIG. 35. Generally, defining the schema involves determining the business processes of the organization for which the system 100 is being implemented. The

consultant then defines the star schema for those business processes. The star schema has a fact table and a number of dimensions. The consultant also defines from where the data in the schema is to be derived. That is, the consultant defines from which fields and tables the information is to be extracted from the source systems 110. The consultant also defines how that data is to be put into the datamart 150. That is, the consultant associates each piece of data with a semantic meaning. This semantic meaning defines how the data from the source system is to be manipulated and how it is to populate the datamart 150. At this point, the consultant can also define the aggregates that can be used in the datamart 150.

The schema definition process of Weissman does not disclose inserting, in accordance with the dependencies, rows of data into the fact table and rows of data into the dimension tables as claimed in the present application.

**Weissman Does Not Place One Of Ordinary Skill In The  
Art In Possession Of Each and Every Element  
Of The Claims Of The Present Application**

Not only must Weissman disclose each and every element of the claims of the present application within the meaning of *Verdegaal* in order to anticipate Applicants' claims, but also Weissman must be an enabling disclosure of each and every element of the claims of the present application within the meaning of *In re Hoeksema*. In *Hoeksema*, the claims were rejected because an earlier patent disclosed a structural similarity to the applicant's chemical compound. The court in *Hoeksema* stated: "We think it is sound law, consistent with the public policy underlying our patent law, that before any publication can amount to a statutory bar to the grant of a patent, its disclosure must be such that a skilled artisan could take its teachings in combination with his own knowledge of the particular art and be in possession of the invention." *In re Hoeksema*, 399 F.2d 269, 273, 158 USPQ 596, 600 (CCPA 1968). The meaning of *Hoeksema* for the present case is that unless Weissman places Applicants' claims in the possession of a person of ordinary skill in the art, Weissman is legally insufficient to anticipate Applicants' claims under 35 USC 102(b).

**Weissman Does Not Enable  
Inferring From The Schema Dependencies Among  
A Fact Table And Related Dimension Tables**

Regarding the second element of claim 1, the Office Action states that Weissman at column 3, lines 1-2; column 3, lines 36-38; column 5, lines 36-32; column 7, lines 42-49; and column 10, lines 24-42 discloses:

inferring from the schema dependencies among a fact table and related dimension tables (Weissman: Column 3, lines 1-2, and lines 36-38; Column 5, lines 36-32; Column 7, lines 42-49; Column 10, lines 24-42)

That is, the Office Action takes the position that Weissman at column 3, lines 1-2; column 3, lines 36-38; column 5, lines 36-32; column 7, lines 42-49; and column 10, lines 24-42 places one of ordinary skill in the art in possession of the second element of claim 1. Applicants respectfully note in response, however, that Weissman at column 3, lines 1-2; column 3, lines 36-38; column 5, lines 36-32; column 7, lines 42-49; and column 10, lines 24-42 does not place one of ordinary skill in the art in possession of the second element of claim 1. What Weissman at column 3, lines 1-2, discloses is: "The schema defines the relationships between the tables and columns." The schema of Weissman does not place one of ordinary skill in the art in possession of inferring from the schema dependencies among a fact table and related dimension tables as claimed in the present application.

What Weissman at column 3, lines 36-38 discloses is:

In some embodiments, the schema is a star schema having one or more fact tables and one or more dimension tables (or dimensions). The schema can be held in a constellation that includes additional information. The constellation can correspond to a business process.



The star schema having fact tables and dimension tables of Weissman does not place one of ordinary skill in the art in possession of inferring from the schema dependencies among a fact table and related dimension tables as claimed in the present application.

What Weissman at column 5, lines 26-32 discloses is:

Focusing on the datamart creation, the system allows a consultant to build a datamart from a schema definition of the sources of the data. From the schema definition the system automatically builds the table needed in the datamart. Also, from the schema definition, and the sources definition, the system can automatically extract the data from those sources.

The datamart creation system of Weissman does not place one of ordinary skill in the art in possession of inferring from the schema dependencies among a fact table and related dimension tables as claimed in the present application.

What Weissman at column 7, lines 42-49 discloses is:

What is important is that the consultant can easily define a schema for the datamart 150 and that definition is kept in the schema definitions 161. From the schema definitions 161, not only can the tables in the datamart 150 be generated, but also the automatic extraction and conversion of the data from the source system 110 can be performed, aggregates are set up, and a query mechanism is generated.

The schema definitions of Weissman do not place one of ordinary skill in the art in possession of inferring from the schema dependencies among a fact table and related dimension tables as claimed in the present application.

What Weissman at column 10, lines 24-42 discloses is:

At block 210, a consultant uses the enterprise manager 102 to define the schema. The schema is defined using the metadata 160. This process is illustrated in greater detail in FIG. 7 through FIG. 35. Generally, defining the schema involves determining the business processes of the organization for which the system 100 is being implemented. The

consultant then defines the star schema for those business processes. The star schema has a fact table and a number of dimensions. The consultant also defines from where the data in the schema is to be derived. That is, the consultant defines from which fields and tables the information is to be extracted from the source systems 110. The consultant also defines how that data is to be put into the datamart 150. That is, the consultant associates each piece of data with a semantic meaning. This semantic meaning defines how the data from the source system is to be manipulated and how it is to populate the datamart 150. At this point, the consultant can also define the aggregates that can be used in the datamart 150.

The schema definition process of Weissman does not place one of ordinary skill in the art in possession of inferring from the schema dependencies among a fact table and related dimension tables as claimed in the present application.

**Weissman Does Not Place One Of Ordinary Skill In The Art In Possession Of Inserting Rows Of Data Into The Tables In Accordance With The Dependencies**

Regarding the third element of claim 1, the Office Action states that Weissman at column 3, lines 1-11, and column 10, lines 24-42 discloses:

Inserting, in accordance with the dependencies, rows of data into the fact table and rows of data into the dimensions tables (Weissman: Column 3, lines 1-11; Column 10, lines 24-42).

That is, the Office Action takes the position that Weissman at column 3, lines 1-11 and column 10, lines 24-42 place one of ordinary skill in the art in possession of the third element of claim 1. Applicants respectfully note in response, however, that Weissman at column 3, lines 1-11, and column 10, lines 24-42 does not place one of ordinary skill in the art in possession of the third element of claim 1. What Weissman at column 3, lines 1-11, in fact discloses is:

The schema defines the relationships between the tables and columns. The description further defines how data is to be manipulated and used to populate the tables in the datamart. That is, the description defines the semantic meaning of the data. The description is further used to create a set of commands to create the tables. The commands are executed causing

the creation of the tables. Importantly, when the semantic meaning is associated with the column and rows, programs for manipulating and propagating data into those columns and rows are automatically defined.

The schema, description and commands of Weissman do not place one of ordinary skill in the art in possession of inserting, in accordance with the dependencies, rows of data into the fact table and rows of data into the dimension tables as claimed in the present application.

What Weissman at column 10, lines 24-42 discloses is:

At block 210, a consultant uses the enterprise manager 102 to define the schema. The schema is defined using the metadata 160. This process is illustrated in greater detail in FIG. 7 through FIG. 35. Generally, defining the schema involves determining the business processes of the organization for which the system 100 is being implemented. The consultant then defines the star schema for those business processes. The star schema has a fact table and a number of dimensions. The consultant also defines from where the data in the schema is to be derived. That is, the consultant defines from which fields and tables the information is to be extracted from the source systems 110. The consultant also defines how that data is to be put into the datamart 150. That is, the consultant associates each piece of data with a semantic meaning. This semantic meaning defines how the data from the source system is to be manipulated and how it is to populate the datamart 150. At this point, the consultant can also define the aggregates that can be used in the datamart 150.

The schema definition process of Weissman does not place one of ordinary skill in the art in possession of inserting, in accordance with the dependencies, rows of data into the fact table and rows of data into the dimension tables as claimed in the present application

### **Claim Rejections – 35 U.S.C. § 103**

Claims 2, 8, and 14 stand rejected for obviousness under 35 U.S.C § 103(a) as being unpatentable over Weissman, *et al.* (U.S. Patent No. 6,212,524), in view of Veronese, *et al.* (U.S. Patent App. Pub. No. 2004/0210445). Additionally, claims 3-6, 9-12, and 15-18

stand rejected for obviousness under 35 U.S.C § 103(a) as being unpatentable over Weissman, *et al.* (U.S. Patent No. 6,212,524), in view of Veronese, *et al.* (U.S. Patent App. Pub. No. 2004/0210445) and further in view of Medicke, *et al.* (U.S. Patent App. Pub. No. 2004/0236786). As is shown below, neither Weissman nor Veronese nor Medicke, either alone or in combination, teaches or suggests a method, system, or computer program product for populating a database as claimed in the present application. Claims 2-6, 8-12, and 14-18 are therefore patentable and should be allowed. Applicants respectfully traverse each rejection individually and request reconsideration of claims 2-6, 8-12, and 14-18.

### **Weissman And Veronese**

Claims 2, 8, and 14 stand rejected under 35 U.S.C § 103(a) as unpatentable over Weissman in view of Veronese. To establish a prima facie case of obviousness, several basic criteria must be met. *Manual of Patent Examining Procedure* §2142. The first element of a prima facie case of obviousness under 35 U.S.C. § 103 is that the proposed combination of the references must teach or suggest all of Applicants' claim limitations. *In re Royka*, 490 F.2d 981, 985, 180 USPQ 580, 583 (CCPA 1974). The second element of a prima facie case of obviousness under 35 U.S.C. § 103 is that there must be a suggestion or motivation to combine the references. *In re Vaeck*, 947 F.2d 488, 493, 20 USPQ2d 1438, 1442 (Fed. Cir. 1991).

### **The Combination Of Weissman And Veronese Does Not Teach All Of Applicants' Claim Limitation**

To establish a prima facie case of obviousness, the proposed combinations of the references must teach or suggest all of the claim limitations of claims 2, 8, and 14. *In re Royka*, 490 F.2d 981, 985, 180 USPQ 580, 583 (CCPA 1974). Claims 2, 8, and 14 depend from claims 1, 7, and 13, respectively, and include all of the limitations of the claims from which they depend. Because the proposed combination of Weissman and Veronese relies on the argument that Weissman teaches each and every element of claims 1, 7, and 13, and because Weissman in fact does not teach or suggest each and every

element of claims 1, 7, and 13, the proposed combination cannot teach or suggest all the claim limitations of claims 2, 8, and 14. The proposed combination therefore cannot establish a prima facie case of obviousness and the rejections should be withdrawn.

**No Suggestion Or Motivation To Combine Weissman And Veronese**

To establish a prima facie case of obviousness, there must be a suggestion or motivation to combine Weissman and Veronese. *In re Vaeck*, 947 F.2d 488, 493, 20 USPQ2d 1438, 1442 (Fed. Cir. 1991). The suggestion or motivation to combine Weissman and Veronese must come from the teaching of the references themselves, and the Examiner must explicitly point to the teaching within the references suggesting the proposed modification. Absent such a showing, the Examiner has impermissibly used “hindsight” occasioned by Applicants’ own teaching to reject the claims. *In re Surko*, 11 F.3d 887, 42 U.S.P.Q.2d 1476 (Fed. Cir. 1997); *In re Vaeck*, 947 F.2d 488m 20 U.S.P.Q.2d 1438 (Fed. Cir. 1991); *In re Gorman*, 933 F.2d 982, 986, 18 U.S.P.Q.2d 1885, 1888 (Fed. Cir. 1991); *In re Bond*, 910 F.2d 831, 15 U.S.P.Q.2d 1566 (Fed. Cir. 1990); *In re Laskowski*, 871 F.2d 115, 117, 10 U.S.P.Q.2d 1397, 1398 (Fed. Cir. 1989).

The Office Action at page 6 states its rationale for the motivation to combine as:

The suggestion or motivation of doing so would be to have new development methodologies, which will be both rapid and easily manageable and modifiable by the users (Veronese: Paragraph 11, lines 3-5).

And further motivation would be to have an improved data warehousing technology (Weissman: Column 2, lines 61-62).

Therefore, it would have been obvious to have added Weissman with Veronese for the benefit of new development methodologies and improved data warehousing technology.

In fact, read in context, Veronese at paragraph 11, lines 3-5, merely describes in general terms a need for new development technologies for “defining organizations of companies, their business processes and their business rules in a declarative manner,”

(Veronese, paragraph 12, lines 2-4) suggesting nothing whatsoever about combining Weissman with Veronese. Moreover, Weissman at column 2, lines 61-62 merely states, "Thus an improved data warehousing technology is desired," suggesting nothing whatsoever about combining Weissman with Veronese. As such, the proposed combination of Weissman and Veronese cannot establish a prima facie case of obviousness.

### **Weissman, Veronese And Medicke**

Claims 3-6, 9-12, and 15-18 stand rejected under 35 U.S.C § 103(a) as unpatentable over Weissman, *et al.* (U.S. Patent No. 6,212,524), in view of Veronese, *et al.* (U.S. Patent App. Pub. No. 2004/0210445) and further in view of Medicke, *et al.* (U.S. Patent App. Pub. No. 2004/0236786. In response, Applicants attach to this Response a declaration pursuant to 37 CFR § 1.131 proving that the invention of this application was completed in the United States at a date prior to May 22, 2003, the effective date of Medicke.

Because this invention was completed in the United States prior to the effective date of Medicke, Medicke is unavailable as a reference against this invention, and claims to this invention cannot be rejected under 35 U.S.C. § 103(a) on the basis of any combination that includes Medicke. Moreover, as pointed out in more detail below, even if Medicke were available as a reference, the proposed combination of Weissman, Veronese, and Medicke would provide no basis for a prima facie case of obviousness. For all these reasons therefore, the rejection of claims 3-6, 9-12, and 15-18 should be withdrawn, and claims 3-6, 9-12, and 15-18 should be allowed.

### **The Combination Of Weissman, Veronese And Medicke Does Not Teach All Of Applicants' Claim Limitation**

To establish a prima facie case of obviousness, the proposed combinations of the references must teach or suggest all of the claim limitations of claims 3-6, 9-12, and 15-18. *In re Royka*, 490 F.2d 981, 985, 180 USPQ 580, 583 (CCPA 1974). Claims 3-6, 9-12, and 15-18 depend from claims 1, 7, and 13, respectively, and include all of the limitations of the claims from which they depend. Because the proposed combination of

Weissman, Veronese and Medicke relies on the argument that Weissman teaches each and every element of claims 1, 7, and 13, and because, as described in detail above in this Response, Weissman in fact does not teach or suggest each and every element of claims 1, 7, and 13, the proposed combination cannot teach or suggest all the claim limitations of claims 3-6, 9-12, and 15-18. The proposed combination therefore cannot establish a prima facie case of obviousness and the rejections should be withdrawn.

**No Suggestion Or Motivation To Combine Weissman, Veronese And Medicke**

To establish a prima facie case of obviousness, there must be a suggestion or motivation to combine Weissman, Veronese and Medicke. *In re Vaeck*, 947 F.2d 488, 493, 20 USPQ2d 1438, 1442 (Fed. Cir. 1991). The suggestion or motivation to combine Weissman, Veronese and Medicke must come from the teaching of the references themselves, and the Examiner must explicitly point to the teaching within the references suggesting the proposed modification. Absent such a showing, the Examiner has impermissibly used “hindsight” occasioned by Applicants’ own teaching to reject the claims. *In re Surko*, 11 F.3d 887, 42 U.S.P.Q.2d 1476 (Fed. Cir. 1997); *In re Vaeck*, 947 F.2d 488m 20 U.S.P.Q.2d 1438 (Fed. Cir. 1991); *In re Gorman*, 933 F.2d 982, 986, 18 U.S.P.Q.2d 1885, 1888 (Fed. Cir. 1991); *In re Bond*, 910 F.2d 831, 15 U.S.P.Q.2d 1566 (Fed. Cir. 1990); *In re Laskowski*, 871 F.2d 115, 117, 10 U.S.P.Q.2d 1397, 1398 (Fed. Cir. 1989).

The Office Action at page 8 states its rationale for the motivation to combine as:

The suggestion or motivation of doing so would be to generate a data warehouse by incorporating data warehouse information in business objects to provide subscribed business objects and generating star-schema tables of data warehouse from the subscribed business objects (Medicke, Paragraph 9). Therefore, it would have been obvious to combine Weissman, Veronese, and Medicke for the benefit of generating a data warehouse.

In fact, Medicke at paragraph 9, merely describes embodiments of the Medicke invention for generating a data warehouse suggesting nothing whatsoever about combining Medicke with Weissman, and Veronese. As such, the proposed combination of Weissman, Veronese, and Medicke cannot establish a prima facie case of obviousness.

### **Relations Among Claims**

Independent claims 7 and 13 are system and computer program product claims for populating a database corresponding to independent method claim 1 that include “means for” and “means, recorded on [a] recording medium, for” populating a database. Claims 2-6, 8-12, and 14-18 depend respectively from independent claims 1, 7, and 13. Each dependent claim includes all of the limitations of the independent claim from which it depends. Because Weissman does not disclose and enable each and every element of the independent claims, Weissman does not disclose and enable each and every element of the dependent claims of the present application. As such, claims 2-6, 8-12, and 14-18 are also patentable and should be allowed.

### **Conclusion**

Claims 1, 7, and 13 stand rejected under 35 U.S.C § 102(b) as being anticipated by Weissman, *et al.* (U.S. Patent No. 6,212,524). Weissman does not disclose each and every element of Applicants’ claims, and Weissman does not enable Applicants’ claims. Weissman therefore does not anticipate Applicants’ claims within the meaning of 35 U.S.C § 102(e). Claims 2, 8, and 14 stand rejected for obviousness under 35 U.S.C § 103(a) as being unpatentable over Weissman, *et al.* (U.S. Patent No. 6,212,524), in view of Veronese, *et al.*, (U.S. Patent App. Pub. No. 2004/0210445). Claims 3-6, 9-12, and 15-18 stand rejected for obviousness under 35 U.S.C § 103(a) as being unpatentable over Weissman, *et al.* (U.S. Patent No. 6,212,524), in view of Veronese, *et al.* (U.S. Patent App. Pub. No. 2004/0210445) and further in view of Medicke, *et al.* (U.S. Patent App. Pub. No. 2004/0236786). For the reasons set forth above, however, the proposed combination of Weissman and Veronese, and the proposed combination of Weissman,



Veronese, and Medicke each fail to establish a prima face case of obviousness. The rejection of claims 1-18 should therefore be withdrawn, and the claims should be allowed. Reconsideration of claims 1-18 in light of the present remarks is respectfully requested.

The Commissioner is hereby authorized to charge or credit Deposit Account No. 09-0447 for any fees required or overpaid.

Respectfully submitted,

Date: April 10, 2006

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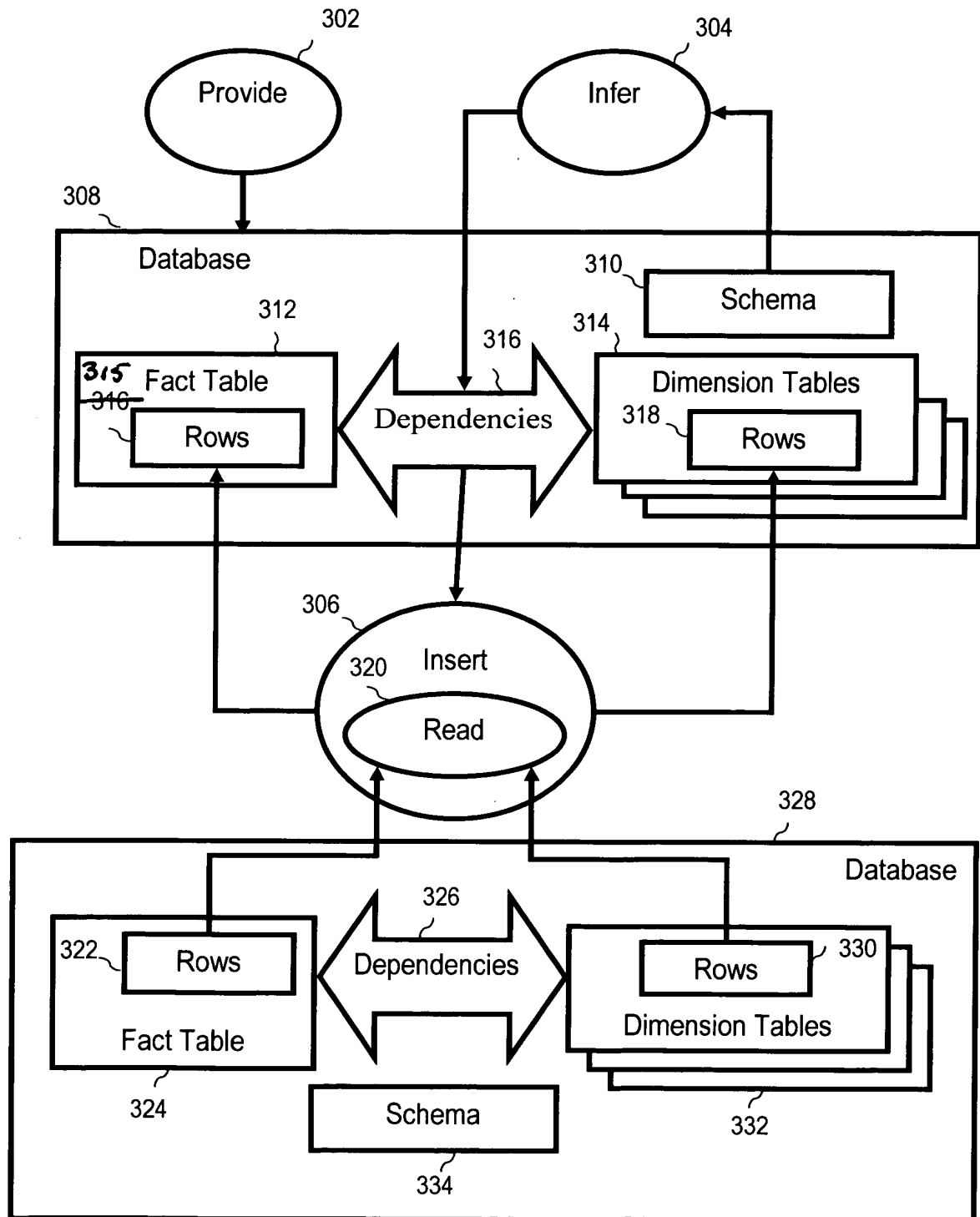


FIG. 3